



**Ontario Federation of Agriculture**

**Ontario AgriCentre**

100 Stone Road West, Suite 206, Guelph, Ontario N1G 5L3  
Tel: (519) 821-8883 • Fax: (519) 821-8810 • [www.ofa.on.ca](http://www.ofa.on.ca)

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Mirek Tybinkowski, Engineering Specialist  
Ministry of the Environment and Climate Change  
Climate Change and Environmental Policy Division  
Land and Water Policy Branch  
40 St. Clair Avenue West, Floor 10  
Toronto ON M4V 1M2

[Land.Water@ontario.ca](mailto:Land.Water@ontario.ca)

Dear Mr. Tybinkowski,

**Re: EBR 012-9498: Review of Ontario's Hauled Sewage Policy and Program**

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 36,000 farm family businesses across Ontario. These farm businesses form the backbone of a robust food system and rural communities with the potential to drive the Ontario economy forward.

As described within this EBR posting, agricultural use of septage is regulated through the Nutrient Management Act, requiring appropriate levels of treatment and regulated as a Non-Agricultural Source Material (NASM). It is our understanding that this EBR posting and policy review only deals with untreated septage, and does not address treated septage. However, OFA is adamant that the agricultural community be involved in any early discussions that may come about regarding NASMs and/or the Nutrient Management Act if they become part of the Policy Proposal that develops from this consultation.

As the government proceeds with developing a Policy Proposal for hauled septage, the OFA encourages the Province of Ontario to build up the capacity for treating hauled sewage and investing in anaerobic digestion technologies. An additional benefit of this approach is that some of these technologies are showing promise in their ability to economically remove excess nutrients such as nitrogen and phosphorous. Investment in technologies such as these can assist the Province in meeting its goals and targets under other agreements and commitments, such as the phosphorous reduction in Lake Erie.

I trust our opinions and recommendations will be given due consideration.

Sincerely,

Keith Currie  
President